

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Criminal No.: 21-CR-108 (2) (PAM/TNL)

UNITED STATES OF AMERICA,

Plaintiff,

VS.

TOU THAO,

Defendant.

## MOTION FOR EARLY DISCLOSURE OF JENCKS ACT MATERIALS

The Defendant, Mr. Tou Thao, by and through his attorneys, Robert Paule and Natalie R. Paule, respectfully moves this Court for an order requiring the Government to provide early disclosure of Jencks Act materials pursuant to 18 U.S.C. §3500. Specifically, Mr. Thao respectfully request the materials be disclosed thirty (30) days prior to trial. This disclosure includes, but is not limited to, any recorded statements, report of a government witness, any written statement by a government witness, any substantially verbatim transcripts, and any grand jury transcripts.

Respectfully submitted,

Dated: This 3<sup>rd</sup> day of August, 2021

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